

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Richard A. Marshack, Trustee MARSHACK HAYS LLP 870 Roosevelt Irvine, CA 92620 949 333-7777 949 333-7778 FAX E-Mail: rmarshack@marshackhays.com</p> <p><input checked="" type="checkbox"/> <i>Movant(s) appearing without an attorney</i> <input type="checkbox"/> <i>Attorney for Movant(s)</i></p>		<p>FOR COURT USE ONLY</p>	
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</p>			
<p>In re:</p> <p>NORTHERN HOLDINGS, LLC,</p> <p>Debtor(s).</p>		<p>CASE NO.: 8:20-bk-13014-ES CHAPTER: 7</p>	
		<p>DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION LBR 9013-1(o)(3)</p>	
		<p>[No Hearing Required]</p>	

1. I am the ☒ Movant(s) or ☐ attorney for Movant(s) or ☐ employed by attorney for Movant(s).
2. On (date): 04/04/2022 Movant(s) filed a motion or application (Motion) entitled: Trustee's Application to Employ Hahn Fife & Co., LLP as Accountant [DK 306]
3. A copy of the Motion and notice of motion is attached to this declaration.
4. On (date): 04/04/2022 Movant(s), served a copy of ☐ the notice of motion or ☒ the Motion and notice of motion on required parties using the method(s) identified on the Proof of Service of the notice of motion.
5. Pursuant to LBR 9013-1(o), the notice of motion provides that the deadline to file and serve a written response and request for a hearing is 14 days after the date of service of the notice of motion, plus 3 additional days if served by mail, or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F).
6. More than 17 days have passed after Movant(s) served the notice of motion.
7. I checked the docket for this bankruptcy case and/or adversary proceeding, and no response and request for hearing was timely filed.
8. No response and request for hearing was timely served on Movant(s) via Notice of Electronic Filing, or at the street address, email address, or facsimile number specified in the notice of motion.

9. Based on the foregoing, and pursuant to LBR 9013-1(o), a hearing is not required.

Movant(s) requests that the court grant the motion and enter an order without a hearing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: 04/22/2022

/s/ Richard A. Marshack
Signature

Richard A. Marshack
Printed name

EXHIBIT 1

RICHARD A. MARSHACK
rmarshack@marshackhays.com
MARSHACK HAYS LLP
870 Roosevelt
Irvine, CA 92620
Telephone: (949) 333-7777
Facsimile: (949) 333-7778

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION

In re
NORTHERN HOLDINGS, LLC

Debtor.

Case No. 8:20-bk-13014-ES

Chapter 7

APPLICATION BY CHAPTER 7 TRUSTEE TO
EMPLOY HAHN FIFE & COMPANY LLP AS
ACCOUNTANT; DECLARATION OF
DONALD T. FIFE IN SUPPORT

[NO HEARING REQUIRED]

TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY JUDGE,
THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL OTHER INTERESTED
PARTIES:

Richard A. Marshack, the Chapter 7 Trustee (“Trustee” or “Applicant”) of the
Bankruptcy Estate of Northern Holding, LLC (the “Debtor”), respectfully files this Application
for entry of a Court Order authorizing the employment of Hahn Fife & Company LLP as the
Trustee’s accountant in this case pursuant to 11 U.S.C. § 327 (the “Application”).

1. PROCEDURAL HISTORY

On October 28, 2020, Debtor filed a petition for bankruptcy under Chapter 11 of Title 11
(the “Petition Date”). The case was then converted to a Chapter 7 on June 15, 2021.

1 2. SERVICES TO BE PERFORMED

2 Applicant proposes to employ Hahn Fife & Company, LLP (“Hahn Fife” or the “Firm”)
3 to provide accounting services to the bankruptcy estate that include preparing and filing
4 necessary state and federal estate tax returns, review of financial documents and any other
5 reasonable duties assigned by the Trustee.

6 3. QUALIFICATIONS OF THE FIRM

7 As indicated by the attached Declaration of Donald T. Fife (the “Fife Declaration”), Hahn
8 Fife is experienced in bankruptcy accounting matters, including those involving trustees,
9 bankruptcy estates, and tax matters included in bankruptcy estates. The firm is competent to
10 perform the requisite accounting services in this case. The members’ breadth of experience and
11 length of service is described in the resumes copies of which are attached as Exhibit “1.”

12 4. THE FIRM IS DISINTERESTED

13 Except as disclosed herein and to the best of the Firm's knowledge, neither the Firm, nor
14 any of the professionals comprising or employed by it, has any connection with the Debtor or the
15 Debtor’s attorneys or accountants, the Debtor’s creditors, or any other outside party in interest,
16 or their respective attorneys or accountants.

17 Based on the foregoing, the Trustee believes that the Firm is a “disinterested person”
18 within the meaning of Bankruptcy Code Section 101(14).

19 The Firm does not have an interest adverse to the Debtor or the bankruptcy Estate. As of
20 the Petition Date, the Firm was not a creditor of the Estate and was not owed any funds by the
21 Debtor.

22 To the best of the Firm’s knowledge, and as set forth in the attached Fife Declaration,
23 none of the professionals comprising or employed by the Firm are related to any judge of the
24 United States Bankruptcy Court for the Central District of California, the United States Trustee,
25 or any person currently employed in the Office of the United States Trustee.

26 5. COMPENSATION PROCEDURE

27 Applicant proposes to retain Hahn Fife upon the following basis: Except as the Court
28 may otherwise determine, after due notice, Hahn Fife will petition the Court under 11 U.S.C.

1 Sections 330 for an allowance of fees and reimbursable costs not more often than every 120
2 days. The petition will be heard upon notice to necessary parties. Hahn Fife will accept
3 compensation and reimbursements of expenses in such amounts that the Court may award.
4 There will be no written employment agreement apart from this Application. The only source of
5 payment or compensation will be the estate. No retainer has been paid or is being proposed to
6 Hahn Fife.

7 The Firm has advised the Trustee that the Firm has not shared or agreed to share any
8 compensation to be received by it in this case with any other person, except as among partners of
9 the Firm.

10 6. CONCLUSION

11 Trustee respectfully requests an order: (1) authorizing the employment of Hahn Fife as
12 accountants, effective March 28, 2022, as an administrative expense of the estate upon the terms
13 and conditions in this application; (2) granting for such other and further relief as is just and
14 proper.

15 Dated: March 31, 2022

Respectfully submitted,

16
17 By: /s/ Richard A. Marshack
RICHARD A. MARSHACK
18 Chapter 7 Trustee for the Bankruptcy Estate of
Northern Holdings, LLC
19
20
21
22
23
24
25
26
27
28

DECLARATION OF DONALD T. FIFE

I, DONALD T. FIFE, declare as follows:

1. I am a duly-licensed certified public accountant in the State of California and a Partner in the firm of Hahn Fife & Company, LLP.

2. I have personal knowledge of the facts in this Declaration and, if called as a witness, could competently testify to these facts.

3. The firm is experienced in bankruptcy matters, including those involving trustees, bankruptcy estates, and issues relating to the tax effects from sale of estate assets. I am competent to perform the requisite accounting services in this case. The firm's breadth of experience and length of service is described in my resume, a copy of which is attached as Exhibit "1."

4. The firm is familiar with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules, and will comply with the Code and Rules.

5. I agree to the terms and conditions of employment in the foregoing application. I am willing to accept compensation and reimbursement of expenses in such amounts that the Court may award. I understand that my compensation may be modified under U.S.C. Section 328, if so warranted. No retainer has been paid or is being proposed to me.

6. The Firm completed a conflicts check prior to submitting this Application.

7. To the best of my knowledge, neither the Firm, nor any of the persons comprising or employed by it, has any connection with the Debtor or the Debtor's attorneys or accountants, the Debtor's creditors, or any other outside party in interest, or their respective attorneys or accountants, except that the Firm represents Richard A. Marshack in his capacity as bankruptcy trustee in other unrelated cases.

8. The Firm is not and was not an investment banker for any outstanding security of the Debtor.

9. The Firm has not been within three (3) years before the date of the filing of the petition herein, an investment banker for a security of the Debtor, or an attorney for such an

1 investment banker in connection with the offer, sale or issuance of any security of the Debtor.

2 10. The Firm is not and was not, within two (2) years before the date of the filing of
3 the petition herein, a director, officer or employee of the Debtor or of any investment banker for
4 any security of the Debtor.

5 11. As of the Petition Date, the Firm was not a creditor of the Estate, an equity
6 security holder or an insider of the Debtor. The Firm has no pre-petition claim against Debtor's
7 Estate and was not owed any funds by the Debtor.

8 12. The Firm neither holds nor represents any interest materially adverse to the
9 interest of the estate or of any class of creditors or equity security holders, by reason of any
10 direct or indirect relationship to, connection with, or interest in, the Debtor or an investment
11 banker for any security of the Debtor, or for any other reason.

12 13. To the best of my knowledge, none of the professionals comprising or employed
13 by the Firm are related to any judge of the United States Bankruptcy Court for the Central
14 District of California, the United States Trustee, or any person currently employed in the Office
15 of the United States Trustee.

16 14. The Firm does not have an interest adverse to the Debtors or the bankruptcy
17 Estate.

18 15. Based on the foregoing, the Trustee believes that the Firm is a "disinterested
19 person" within the meaning of Bankruptcy Code § 101(14).

20 After conducting or supervising the investigation described in Paragraph 6 above, I
21 declare under penalty of perjury, that the foregoing is true and correct except that I declare that
22 Paragraphs 7 through 15 are stated on information and belief.

23 Executed on March 29, 2022, at Pasadena, California.

24
25 
26 DONALD T. FIFE
27
28

EXHIBIT 1

Firm Statement of Qualifications

The Firm was formed in September of 2003 and provides accounting and consulting services relating primarily to bankruptcy, litigation, turnaround, fraud and receivership matters. The Firm's professionals have extensive experience and training in these specialized fields of accounting practice and have served a broad range of clients in Southern California for many years. Following are brief summaries of the qualifications of firm's current professional staff. It is expected that the Firm will add professional staff as required to serve client needs.

Donald T. Fife, CPA

Mr. Fife currently practices exclusively in bankruptcy, turnaround and litigation consulting, providing services such as financial analysis, forensic accounting, tax services and expert witness testimony. He serves clients such as bankruptcy trustees, creditors, debtors, creditor's committees and parties to civil litigation.

Mr. Fife has over 16 years of business and financial experience in accounting, bankruptcy, turnaround, taxation and fraud investigation. He formerly practiced as an accountant and consultant with Price Waterhouse, FTI Policano & Manzo, PHB Hagler Bailly, Inc., Biggs & Company and Spicer & Oppenheim. Over the last 14 years, his career has been concentrated in the areas of bankruptcy, turnaround, and litigation support.

Mr. Fife is a Certified Public Accountant licensed in California. He is also a member of the American Institute of Certified Public Accountants, the California Society of CPA's, the National Association of Bankruptcy Trustees, the American Bankruptcy Institute, and the California Bankruptcy Forum. He received his bachelor's degree in Business Administration/Accounting from California State University at Los Angeles.

Hourly Rate: \$470.00

**RATES FOR REIMBURSEMENT OF INCURRED EXPENSES
HAHN FIFE & COMPANY, LLP**

PHOTOCOPYING	\$0.10 PER PAGE
TELECOPIER - INCOMING	\$0.15 PER PAGE
OUTGOING	\$1.00 PER PAGE
MILEAGE	\$0.27 PER MILE
TELEPHONE	ACTUAL COST
POSTAGE	ACTUAL COST
MESSENGER	ACTUAL COST
OVERNIGHT MAIL	ACTUAL COST
ON-LINE COMPUTER RESEARCH	ACTUAL COST
FILING FEES	ACTUAL COST
DEPOSITION OR WITNESS FEES	ACTUAL COST
PARKING	ACTUAL COST

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **APPLICATION BY CHAPTER 7 TRUSTEE TO EMPLOY HAHN FIFE & COMPANY LLP AS ACCOUNTANT; DECLARATION OF DONALD T. FIFE IN SUPPORT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 1, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:** On **April 4, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

NORTHERN HOLDING, LLC
ATTN: OFFICER, A MANAGING OR GENERAL AGENT,
OR TO ANY OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE SERVICE
13217 JAMBOREE RD #429
TUSTIN, CA 92782

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PURSUANT TO COURTROOM POLICIES AND PROCEDURES OF HONORABLE ERITHE A. SMITH, COURTROOM 5A, § VIII. JUDGES' OR COURTESY COPIES, EXCEPT FOR DOCUMENTS 200 PAGES OR OVER, INCLUDING EXHIBITS, JUDGE SMITH **DOES NOT** REQUIRE JUDGES' COPIES.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 4, 2022
Date

Pam Kraus
Printed Name

/s/ Pam Kraus
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **INTERESTED PARTY COURTESY NEF:** William H Brownstein Brownsteinlaw.bill@gmail.com
- **INTERESTED PARTY COURTESY NEF:** Steve Burnell sburnell@sulmeyerlaw.com, sburnell@ecf.courtdrive.com; sburnell@ecf.inforuptcy.com; mviramontes@sulmeyerlaw.com
- **ATTORNEY FOR INTERESTED PARTY LEE CODDING:** Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **ATTORNEY FOR U.S. TRUSTEE (SA):** Nancy S Goldenberg nancy.goldenberg@usdoj.gov
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Michael J Gomez mgomez@frandzel.com, dmoore@frandzel.com
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR INTERESTED PARTY LEE CODDING:** Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- **ATTORNEY FOR RESPONDENTS ERICH RUSSELL AND JOANNE RUSSELL:** Kari L Ley Ley1238@att.net
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** Tinho Mang tmang@marshackhays.com, tmang@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@ecf.courtdrive.com
- **TRUSTEE RICHARD A MARSHACK (TR):** Richard A Marshack (TR) pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titledxi.com
- **ATTORNEY FOR INTERESTED PARTY BANK DIRECT CAPITAL FINANCE:** Elissa Miller emiller@sulmeyerlaw.com, emillersk@ecf.inforuptcy.com; ccaldwell@sulmeyerlaw.com
- **ATTORNEY FOR DEBTOR NORTHERN HOLDING LLC:** Roksana D. Moradi-Brovia roksana@rhmfir.com, matt@rhmfir.com; janita@rhmfir.com; susie@rhmfir.com; max@rhmfir.com; priscilla@rhmfir.com; pardis@rhmfir.com; russ@rhmfir.com; rebecca@rhmfir.com; david@rhmfir.com; sloan@rhmfir.com
- **ATTORNEY FOR CREDITOR ADLER BELMONT GROUP, INC.:** Paul F Ready tamara@farmerandready.com
- **ATTORNEY FOR DEBTOR NORTHERN HOLDING LLC:** Matthew D. Resnik matt@rhmfir.com, roksana@rhmfir.com; janita@rhmfir.com; susie@rhmfir.com; max@rhmfir.com; priscilla@rhmfir.com; pardis@rhmfir.com; russ@rhmfir.com; rebecca@rhmfir.com; david@rhmfir.com; sloan@rhmfir.com
- **ATTORNEY FOR INTERESTED PARTY RIBOLI PASO ROBLES, LLC:** Victor A Sahn vsahn@sulmeyerlaw.com, pdillamar@sulmeyerlaw.com; pdillamar@ecf.inforuptcy.com; vsahn@ecf.inforuptcy.com; cblair@sulmeyerlaw.com; cblair@ecf.inforuptcy.com
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** Kristine A Thagard kthagard@marshackhays.com, kthagard@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **UNITED STATES TRUSTEE (SA):** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Reed S Waddell rwaddell@frandzel.com, sking@frandzel.com
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Gerrick Warrington gwarrington@frandzel.com, sking@frandzel.com
- **INTERESTED PARTY COURTESY NEF:** David Wood dwood@marshackhays.com, dwood@ecf.courtdrive.com; lbuchananmh@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

EXHIBIT 2

RICHARD A. MARSHACK
rmarshack@marshackhays.com
MARSHACK HAYS LLP
870 Roosevelt
Irvine, CA 92620
Telephone: (949) 333-7777
Facsimile: (949) 333-7778

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION

In re
NORTHERN HOLDINGS, LLC

Debtor.

Case No. 8:20-bk-13014-ES

Chapter 7

NOTICE OF APPLICATION BY CHAPTER 7
TRUSTEE TO EMPLOY HAHN FIFE &
COMPANY LLP AS ACCOUNTANT

[NO HEARING REQUIRED]

TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY JUDGE,
THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL OTHER INTERESTED
PARTIES:

PLEASE TAKE NOTICE that Richard A. Marshack, the Chapter 7 Trustee (“Trustee” or
“Applicant”) of the Bankruptcy Estate of Northern Holding, LLC (the “Debtor”), has filed an
Application for entry of a Court Order authorizing the employment of Hahn Fife & Company
LLP as the Trustee’s accountant in this case pursuant to 11 U.S.C. § 327 (the “Application”)
effective March 28, 2022, as an administrative expense of the estate.

On October 28, 2020, Debtor filed a petition for bankruptcy under Chapter 11 of Title 11
(the “Petition Date”). The case was then converted to a Chapter 7 on June 15, 2021.

Applicant proposes to employ Hahn Fife & Company, LLP (“Hahn Fife” or the “Firm”)
to provide accounting services to the bankruptcy estate that include preparing and filing

1 necessary state and federal estate tax returns, review of financial documents and any other
2 reasonable duties assigned by the Trustee.

3 Applicant proposes to retain Hahn Fife upon the following basis: Except as the Court
4 may otherwise determine, after due notice, Hahn Fife will petition the Court under 11 U.S.C.
5 Sections 330 for an allowance of fees and reimbursable costs not more often than every 120
6 days. The petition will be heard upon notice to necessary parties. Hahn Fife will accept
7 compensation and reimbursements of expenses in such amounts that the Court may award.
8 There will be no written employment agreement apart from this Application. The only source of
9 payment or compensation will be the estate. No retainer has been paid or is being proposed to
10 Hahn Fife.

11 The Firm has advised the Trustee that the Firm has not shared or agreed to share any
12 compensation to be received by it in this case with any other person, except as among partners of
13 the Firm.

14 The Firm's current hourly billing rates are as follows:

15

Timekeeper	Rate
Donald T. Fife	\$470.00

17

18

19 The complete scope and terms of the employment are detailed in the Application a copy
20 of which can be obtained by contacting Donald T. Fife at 790 E. Colorado Blvd., 9th Floor,
21 Pasadena, CA 91101. The Application is based on 11 U.S.C. Section 327 and the Firm intends
22 to seek compensation pursuant to 11 U.S.C. Sections 330 and 331.

23 **PLEASE TAKE FURTHER NOTICE** that any response and request for hearing as to
24 the proposed employment must be in the form as required by Local Bankruptcy Rules 2014-1(b),
25 9013-1(f) and (o) and filed with the Clerk of the above-entitled Court. The deadline for any
26 response and request for hearing is 14 days after the date of service of this Notice, plus an
27 additional 3 days unless this Notice was served by personal delivery or posting as described in
28 F.R.Civ.P. 5(b)(2)(A)-(B). A copy of any response or request for hearing must be served on

1 Richard A. Marshack at the address indicated above and Donald T. Fife at 790 E. Colorado
2 Blvd., 9th Floor, Pasadena, CA 91101. A copy must also be served on the Office of the United
3 States Trustee, 411 W. Fourth Street, Suite 7160, Santa Ana, California 92701. Failure to timely
4 respond may be deemed as acceptance of the proposed employment. See Local Bankruptcy
5 Rules 9013-1(h).

6 Dated: April 4, 2022

Respectfully submitted,

7
8 By: /s/ Richard A. Marshack
RICHARD A. MARSHACK
9 Chapter 7 Trustee for the Bankruptcy Estate of
Northern Holdings, LLC
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **NOTICE OF APPLICATION BY CHAPTER 7 TRUSTEE TO EMPLOY HAHN FIFE & COMPANY LLP AS ACCOUNTANT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 1, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:** On **April 4, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

NORTHERN HOLDING, LLC
ATTN: OFFICER, A MANAGING OR GENERAL AGENT,
OR TO ANY OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE SERVICE
13217 JAMBOREE RD #429
TUSTIN, CA 92782

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PURSUANT TO COURTROOM POLICIES AND PROCEDURES OF HONORABLE ERITHE A. SMITH, COURTROOM 5A, § VIII. JUDGES' OR COURTESY COPIES, EXCEPT FOR DOCUMENTS 200 PAGES OR OVER, INCLUDING EXHIBITS, JUDGE SMITH **DOES NOT** REQUIRE JUDGES' COPIES.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 4, 2022
Date

Pam Kraus
Printed Name

/s/ Pam Kraus
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:

- **INTERESTED PARTY COURTESY NEF:** William H Brownstein Brownsteinlaw.bill@gmail.com
- **INTERESTED PARTY COURTESY NEF:** Steve Burnell sburnell@sulmeyerlaw.com, sburnell@ecf.courtdrive.com; sburnell@ecf.inforuptcy.com; mviramontes@sulmeyerlaw.com
- **ATTORNEY FOR INTERESTED PARTY LEE CODDING:** Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **ATTORNEY FOR U.S. TRUSTEE (SA):** Nancy S Goldenberg nancy.goldenberg@usdoj.gov
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Michael J Gomez mgomez@frandzel.com, dmoore@frandzel.com
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR INTERESTED PARTY LEE CODDING:** Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- **ATTORNEY FOR RESPONDENTS ERICH RUSSELL AND JOANNE RUSSELL:** Kari L Ley Ley1238@att.net
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** Tinho Mang tmang@marshackhays.com, tmang@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@ecf.courtdrive.com
- **TRUSTEE RICHARD A MARSHACK (TR):** Richard A Marshack (TR) pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titledi.com
- **ATTORNEY FOR INTERESTED PARTY BANK DIRECT CAPITAL FINANCE:** Elissa Miller emiller@sulmeyerlaw.com, emillersk@ecf.inforuptcy.com; ccaldwell@sulmeyerlaw.com
- **ATTORNEY FOR DEBTOR NORTHERN HOLDING LLC:** Roksana D. Moradi-Brovia roksana@rhmfir.com, matt@rhmfir.com; janita@rhmfir.com; susie@rhmfir.com; max@rhmfir.com; priscilla@rhmfir.com; pardis@rhmfir.com; russ@rhmfir.com; rebecca@rhmfir.com; david@rhmfir.com; sloan@rhmfir.com
- **ATTORNEY FOR CREDITOR ADLER BELMONT GROUP, INC.:** Paul F Ready tamara@farmerandready.com
- **ATTORNEY FOR DEBTOR NORTHERN HOLDING LLC:** Matthew D. Resnik matt@rhmfir.com, roksana@rhmfir.com; janita@rhmfir.com; susie@rhmfir.com; max@rhmfir.com; priscilla@rhmfir.com; pardis@rhmfir.com; russ@rhmfir.com; rebecca@rhmfir.com; david@rhmfir.com; sloan@rhmfir.com
- **ATTORNEY FOR INTERESTED PARTY RIBOLI PASO ROBLES, LLC:** Victor A Sahn vsahn@sulmeyerlaw.com, pdillamar@sulmeyerlaw.com; pdillamar@ecf.inforuptcy.com; vsahn@ecf.inforuptcy.com; cblair@sulmeyerlaw.com; cblair@ecf.inforuptcy.com
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** Kristine A Thagard kthagard@marshackhays.com, kthagard@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **UNITED STATES TRUSTEE (SA):** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Reed S Waddell rwaddell@frandzel.com, sking@frandzel.com
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Gerrick Warrington gwarrington@frandzel.com, sking@frandzel.com
- **INTERESTED PARTY COURTESY NEF:** David Wood dwood@marshackhays.com, dwood@ecf.courtdrive.com; lbuchananmh@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

2. SERVED BY UNITED STATES MAIL: CONTINUED:

SECURED CREDITOR / POC
ADDRESS

ERICH RUSSELL
2380 LIVE OAK ROAD
PASO ROBLES, CA 93446-9693

SECURED CREDITOR

FARM CREDIT WEST
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE
3755 ATHERTON RD
11707 FAIR OAKS BLVD
ROCKLIN, CA 95765

SECURED CREDITOR / POC
ADDRESS

FARM CREDIT WEST, FLCA
ATTN: KEVIN E. RALPH
3755 ATHERTON DRIVE
ROCKLIN CA 95765-3701

**SECURED CREDITOR / POC
ADDRESS**

JAMES W. HAMILTON ACTTC
SAN LUIS OBISPO TAX
COLLECTOR
1055 MONTEREY STREET
SUITE D-290
SAN LUIS OBISPO CA 93408-1003

SECURED CREDITOR

MORTGAGE LENDER SERVICES AS
AGENT
FARM CREDIT WEST, FLCA, AS
TRUSTEE
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE
11707 FAIR OAKS BLVD
FAIR OAKS, CA 95628-2816

CREDITOR

ATTORNEY GENERAL
UNITED STATES DEPARTMENT OF
JUSTICE
BEN FRANKLIN STATION
P.O. BOX 683
WASHINGTON, DC 20044

CREDITOR

BANK OF AMERICA
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE
PO BOX 15019
WILMINGTON, DE 19850-5019

CREDITOR

CALIFORNIA DEPT OF TAX AND FEE
ADMI
SPECIAL OPS, MIC 29
PO BOX 942879
SACRAMENTO, CA 94279-0005

CREDITOR

CAPITAL ONE
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE
P.O. BOX 60599
CITY OF INDUSTRY, CA 91716-0599

CREDITOR

CIVIL PROCESS CLERK
UNITED STATES ATTORNEY'S
OFFICE
FEDERAL BUILDING, ROOM 7516
300 NORTH LOS ANGELES
STREET
LOS ANGELES, CA 90012

RTD 02/22/22 UTF**CREDITOR**

ELECTRO-STEAM GENERATOR CORP.
~~ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE~~
50 INDEL AVENUE
RANOCAS, NJ 08073

NEW ADDR PER WEBSITE**CREDITOR**

ELECTRO-STEAM GENERATOR
CORP.
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE
50 INDEL AVENUE
P.O. BOX 438
RANOCAS, NJ 08073-0438

CREDITOR / POC ADDRESS

FRANCHISE TAX BOARD
BANKRUPTCY SECTION MS A340
PO BOX 2952
SACRAMENTO CA 95812-2952

CREDITOR

HILCO REAL ESTATE, LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE
5 REVERE DRIVE, SUITE 320
NORTHBROOK, IL 60062

CREDITOR / POC ADDRESS

INTERNAL REVENUE SERVICE
P.O. BOX 7346
PHILADELPHIA, PA 19101-7346

OTHER PROFESSIONAL

LEE CODDING
13217 JAMBOREE RD #429
TUSTIN, CA 92782

CREDITOR

PG&E
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE
P.O. BOX 99700
SACRAMENTO, CA 95899-7300

CREDITOR

RABBIT RIDGE WINE SALES, INC.
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE
179 NIBLICK RD, #406
PASO ROBLES, CA 93446-9693

RTD 08/30/21 UTF**CREDITOR**

SUNBELT RENTALS
~~ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE
P.O. BOX 409211
ATLANTA, GA 30384-9211~~

NEW ADDR PER CA SOS**CREDITOR**

SUNBELT RENTALS, INC.
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE
2341 DEERFIELD DRIVE
FORT MILL, SC 29715

NEW ADDR PER CA SOS**CREDITOR**

SUNBELT RENTALS, INC.
C/O C T CORPORATION SYSTEM,
AGENT FOR SERVICE OF PROCESS
330 N BRAND BLVD
GLENDALE, CA 91203

CREDITOR

THOMAS K RACKERBY
C/O TOM PROUNTZOS
GOODMAN NEUMAN HAMILTON
LLP
ONE POST STREET, SUITE 2100
SAN FRANCISCO, CA 94104

CREDITOR

WEST COAST WINE PARTNERS
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE
134 CHURCH STREET
SONOMA, CA 95476-6612

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION [LBR 9013-1(o)(3)]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 04/22/2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 04/22/2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

Northern Holding, LLC
13217 Jamboree Rd #429
Tustin, CA 92782

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

[Courtesy copy not required per General Order 20-02]

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

04/22/2022
Date

Pamela Kraus
Printed Name

/s/ Pamela Kraus
Signature

- William H Brownstein Brownsteinlaw.bill@gmail.com
- Steve Burnell sburnell@sulmeyerlaw.com,
sburnell@ecf.courtdrive.com;sburnell@ecf.inforuptcy.com;mviramontes@sulmeyerlaw.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- Nancy S Goldenberg nancy.goldenberg@usdoj.gov
- Michael J Gomez mgomez@frandzel.com, dmoore@frandzel.com
- D Edward Hays ehays@marshackhays.com,
ehays@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com
- Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- Kari L Ley Ley1238@att.net
- Tinho Mang tmang@marshackhays.com,
tmang@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@ecf.courtdrive.com
- Richard A Marshack (TR) pkraus@marshackhays.com,
rmarshack@iq7technology.com;ecf.alert+Marshack@titlexi.com
- Elissa Miller emiller@sulmeyerlaw.com,
emillersk@ecf.inforuptcy.com;ccaldwell@sulmeyerlaw.com
- Roksana D. Moradi-Brovia roksana@rhmfir.com,
matt@rhmfir.com;rosario@rhmfir.com;susie@rhmfir.com;max@rhmfir.com;priscilla@rhmfir.com;pardis@rhmfir.com;russ@rhmfir.com;rebeca@rhmfir.com;david@rhmfir.com;sloan@rhmfir.com
- Paul F Ready tamara@farmerandready.com
- Matthew D. Resnik matt@rhmfir.com,
roksana@rhmfir.com;rosario@rhmfir.com;susie@rhmfir.com;max@rhmfir.com;priscilla@rhmfir.com;pardis@rhmfir.com;russ@rhmfir.com;rebeca@rhmfir.com;david@rhmfir.com;sloan@rhmfir.com
- Victor A Sahn vsahn@sulmeyerlaw.com,
pdillamar@sulmeyerlaw.com;pdillamar@ecf.inforuptcy.com;vsahn@ecf.inforuptcy.com;cblair@sulmeyerlaw.com;cblair@ecf.inforuptcy.com
- Kristine A Thagard kthagard@marshackhays.com,
kthagard@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov
- Reed S Waddell rwaddell@frandzel.com, sking@frandzel.com
- Gerrick Warrington gwarrington@frandzel.com, sking@frandzel.com
- David Wood dwood@marshackhays.com,
dwood@ecf.courtdrive.com;lbuchananmh@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com